

EXHIBIT H

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF SUSANNE KIKKENBORG

I, Susanne Kikkenborg, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship¹.

3. On September 11, 2001, I was present at World Trade Center 3: Marriott Hotel when the terrorist attacks of the World Trade Center Towers occurred.

4. I began working for Marriott as a demi-chef on April 27, 1981 and continued in that capacity until September 11, 2001. I began to work solely with Greenhouse Café after the 1993 bombing. I have been unable to work since September 11, 2001, due to my medical problems.

5. I was in New York City at Ground Zero when the plane(s) hit the towers and I received physical injuries in the escape and collapse. I was going about my everyday routine

¹ My married name was Susanne Bachman Russell in October of 1984 when I received my certificate of naturalization.

working in the kitchen when my life was altered forever. When the first plane struck 2 WTC, I attempted to flee the hotel but was forced back inside due to falling debris. The hotel was filled with dust, debris, and smoke. I was eventually able to escape the hotel, crossing the West Side Highway when the second plane struck 1 WTC. I was five blocks away from the World Trade Center, on Wall Street, when 2 WTC collapsed. I was, again, enveloped in dust, smoke, and debris. I began to cough excessively. I remember feeling dust in my airways. In total, I spent eight hours in the disaster area, “blackout”, breathing in excessive smoke, dust, and debris.

6. As a result of these terrorist attacks, I suffered the following specific injuries from September 11, 2001: Interstitial Lung Disease, Chronic Respiratory Disorder, Chronic Rhino Sinusitis, Gastroesophageal Reflux Disease (GERD), Reactive Airways Dysfunction Syndrome (RADS), and extrinsic asthma. Additionally, I have developed multiple autoimmune diseases including lupus, methylenetetrahydrofolate reductase (MTHFR) and diverticulitis. I also suffer from thyroid and bladder issues.

7. Additionally, I suffer from Post-Traumatic Stress Disorder (PTSD). Following the September 11th attacks, I attended therapy for approximately eight years to help me cope with what I experienced that day. My therapy also revealed that I was suffering from survivor’s guilt. I started by attending therapy twice a week. However, I continued to suffer from sleep loss and severe nightmares. I also fear the sound of planes, especially low flying planes, crowds, and tall buildings. As a result, I uprooted my life and relocated to New Haven, Connecticut. In New Haven I was able to locate a PTSD Center, where I attended sessions three times a week. Unfortunately, therapy was not enough to diminish my nightmares and trauma and I subsequently developed an alcohol dependency. I became an alcoholic as a result of my PTSD. Thankfully, I have since been clean and sober for twelve years. I have finished my therapy and no longer suffer from recurring

nightmares but still experience significant trouble with sleeping. I take medication for my anxiety and to aid with sleep.

8. I sought medical attention for my injuries. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks. My 2001 record from Dr. Ira Gould states: "There is no question that patient has permanent chronic respiratory tract inflammation disease as a result of her noxious exposures on 9-11-01." Dr. Gould goes on to say, "Reactive Airway Disease/Dysfunction Syndrome that was pointed out by Dr. Carl Friedman has been reported in the medical literature as having been found in large numbers of WTC 9-11-01 victims and is undoubtedly present in this patient as well." Dr. Gould confirms that "there is a definite causal relationship between [my] massive unprotected heat, smoke, dust and fume exposure while working at the World Trade Center on September 11, 2001 and [my] development of [these diagnoses]."

9. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.

10. I, like so many other victims of these attacks, suffer from a severe loss of enjoyment in my everyday life. Prior to September 11, 2001, I had a very active lifestyle. I was in great shape and physically fit from jogging, biking, and teaching aerobics classes in my community. I used to bicycle three miles from Brooklyn to my job in the WTC every day for five years prior to the attacks. After 9-11 due to the injuries inflicted upon me, I am no longer physically able to jog, bike, or do any aerobic exercises. I get short of breath and feel fatigued just by walking, because of my respiratory injuries. I can no longer do my own household chores due to my inability to

tolerate fumes from some cleaning supplies that exacerbate my symptoms. I spend most of my time indoors, especially when the weather conditions are humid or very cold because of my breathing difficulties and fatigue.

11. I previously pursued a claim (Claim Number VCF0007367) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 23 day of January 2020.

Susanne Kickenborg
Signature of Declarant

Exhibits Filed Under Seal